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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.

23 UBER TECHNOLOGIES, INC.;
24 OTTOMOTTO LLC; OTTO TRUCKING
25 LLC,

26 Defendants.

27
28 **DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
REPLY IN SUPPORT OF ITS MOTION
FOR ORDER TO SHOW CAUSE WHY
DEFENDANTS SHOULD NOT BE HELD
IN CONTEMPT OF THE PRELIMINARY
INJUNCTION ORDER (Dkt. 426) AND
EXPEDITED DISCOVERY ORDER (Dkt.
61)**

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1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Reply in Support of its Motion for
 7 Order to Show Cause Why Defendants Should Not Be Held In Contempt of the Preliminary Injunction
 8 Order (Dkt. 426) and Expedited Discovery Order (Dkt. 61), filed concurrently herewith (the
 9 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply	Highlighted Portions	Defendants (blue highlighting)

13 3. The highlighted portions of Waymo’s Reply contain references to information that
 14 Defendants have designated as confidential and/or highly confidential.

15 4. Waymo expects Defendants to file one or more declarations in accordance with the
 16 Local Rules.

17 I declare under penalty of perjury under the laws of the State of California and the United
 18 States of America that the foregoing is true and correct, and that this declaration was executed in Los
 19 Angeles, California, on July 12, 2017.

21 By /s/ Lindsay Cooper
 22 Lindsay Cooper
 23 Attorney for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven